



21st Floor
1251 Avenue of the Americas
New York, NY 10020

Katherine M. Bolger
212.489.8230 tel
212.489.8340 fax

katebolger@dwt.com

The motion is GRANTED but defendants should make sure that the right version of the unredacted filing was submitted.

January 27, 2025

The Clerk of Court is directed to terminate the motion at Dkt. 68.

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. Courtroom 15
New York, NY 10007-1312

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Dated: January 28, 2025

Re: Wang v. Sussman et al., No. 1:24-cv-03987-AS

Dear Judge Subramanian:

We represent Defendants Sammy Sussman, Vox Media, LLC, and New York Media LLC (collectively, “Defendants”), in the above-referenced action. In support of Defendants’ motion for attorneys’ fees, Defendants are filing herewith their billing statements for this litigation. These billing statements necessarily include descriptions of Defendants’ counsel’s work and include privileged attorney client and attorney work product descriptions.

Particularly given that Plaintiff Liang Wang still can appeal the decision dismissing this action, to protect these privileged communications from disclosure, Defendants are filing the unredacted version of those billing statements as Exhibit E *ex parte* for the Court’s review. The *ex parte* version of Exhibit E contains redactions for only those entries for which Defendants do not seek attorneys’ fees. Pursuant to the Federal Rules of Civil Procedure 5.2(e) and Your Honor’s Individual Practice Rule 11, Defendants respectfully request to concurrently file a public version of Exhibit E with the descriptions of all time entries redacted. Those redaction boxes specify that the redacted material is “PRIVILEGED AS A/C COMM. AND/OR WORK PRODUCT.”

The parties are not scheduled to appear before the court. I have conferred with counsel for Plaintiff, who reserves their position.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Katherine M. Bolger

Katherine M. Bolger

cc: Counsel of Record (via ECF)

DWT.COM

Anchorage | Bellevue | Los Angeles | New York
Portland | San Francisco | Seattle | Washington, D.C.